

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NANCY J. CLINE, Personal
Representative of THE ESTATE OF
GLEN H. CLINE, JR., Deceased, et
al

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Plaintiffs

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v.

CASE NUMBER: JFM-03-CV-529

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JOHN JAMES CHRISTY

And

*

AGAPE HARVESTER CHURCH, INC.

*

Defendants

* * * * *

ANSWER TO COMPLAINT

Defendants, John James Christy and Agape Harvester Church,
Inc., by their attorney, Lawrence E. Ballantine, respectfully
respond to Plaintiffs' Complaint and Amended Complaint and answer
as follows:

I.

1. Defendants admit the allegations contained in paragraph
number one.

2. Defendants admit the allegations contained in paragraph
number two.

3. Defendants admit the allegations contained in paragraph
number three.

4. Defendants admit the allegations contained in paragraph
number four.

5. Defendants admit the allegations contained in paragraph
number five.

6. Defendants admit the allegations contained in paragraph
number six.

7. Defendants admit the allegations contained in paragraph

number seven.

8. Defendants are without sufficient information to either admit or deny the allegations set forth in paragraph number eight.

9. Defendants admit the allegations contained in paragraph number nine.

10. Defendants deny the allegations in paragraph number ten.

11. Defendants are without sufficient information to either admit or deny the allegations set forth in paragraph number eleven.

12. Defendants deny the allegations in paragraph number twelve.

13. Defendants are without sufficient information to either admit or deny the allegations set forth in paragraph number thirteen.

14. Defendants deny the allegations in paragraph number fourteen.

15. Defendants deny the allegations in paragraph number fifteen.

16. Defendants deny the allegations in paragraph number sixteen.

17. Defendants deny the allegations in paragraph number seventeen.

18. Defendants deny the allegations in paragraph number eighteen.

19. Defendants deny the allegations in paragraph number nineteen.

20. Defendants are without sufficient information to either

admit or deny the allegations set forth in paragraph number twenty.

21. Defendants deny the allegations in paragraph number twenty-one.

22. Defendants deny the allegations in paragraph number twenty-two.

23. Defendants deny the allegations in paragraph number twenty-three.

24. Defendants deny the allegations in paragraph number twenty-four.

25. Defendants deny the allegations in paragraph number twenty-five.

26. Defendants admit the allegations contained in paragraph number twenty-six.

27. Defendants admit the allegations contained in paragraph number twenty-seven.

28. Defendants deny the allegations in paragraph number twenty-eight.

29. Defendants deny the allegations in paragraph number twenty-nine.

30. Defendants deny the allegations in paragraph number thirty.

31. Defendants deny the allegations in paragraph number thirty-one a. through d.

32. Defendants admit the allegations contained in paragraph number thirty-two.

33. Defendants deny the allegations in paragraph number thirty-three.

34. Defendants deny the allegations in paragraph number thirty-four.

II.

The Plaintiffs' claim fails to state a claim upon which relief can be granted.

III.

This Defendants assert the following affirmative defenses:

1. Assumption of risk.
2. Contributory negligence.
3. Estoppel.
4. Statute of Limitations.

DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38(b), the Defendants, John James Christy and Agape Harvester Church, Inc., demand a Trial by Jury in this matter.

LAWRENCE E. BALLANTINE
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Attorney for Defendants
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY, That on this 12th day of March, 2003, a copy of the foregoing Answer to Complaint, was mailed, postage prepaid, to **Leonard A. Orman, P.A.**, 26 South Street, Baltimore, Maryland 21202; **Timothy R. Freel, Esquire, Freel & Freel, P.C.**, 231 Newman Street, East Tawas, Michigan 48730, and **Elliot N. Lewis, Esquire, Elliot N. Lewis, P.A.**, 1 East Lexington Street, Suite 201, Baltimore, Maryland 21202, Attorneys for Plaintiffs.

LAWRENCE E. BALLANTINE

LEB/dmt